

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE:	§	Case No. 23-34815 (JPN)
GALLERIA 2425 Owner, LLC.	§	
Debtor	§	Chapter 11

**EMERGENCY MOTION TO CONTINUE HEARING ON
OBJECTION TO CLAIM OF NATIONAL BANK OF KUWAIT**

TO THE HONORABLE U.S. BANKRUPTCY JUDGE:

COMES NOW 2425 WL, LLC (“Movant”) and files this Motion to Continue Hearing on

Objection to Claim of National Bank of Kuwait and would show as follows:

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY

Emergency (or expedited) relief has been requested. If the Court considers the motion on an emergency (or expedited) basis, then you will have less than 21 days to answer. If you object to the requested relief or if you believe that the emergency (or expedited) consideration is not warranted, you should file an immediate response.

1. Movant self-calendared a hearing on the Objection to Claim of National Bank of Kuwait on June 18, 2024 at 11:00 a.m.
2. Ali Choudhri is the principal of 2425 WL, LLC. On Sunday June 2, 2024, Mr. Choudhri was rushed to the hospital. He was diagnosed with a stroke. Mr. Choudhri is presently admitted to the stroke unit of Methodist Hospital. As a result, he is not presently able to assist with preparation for the claims objection and his ability to physically attend the hearing is unknown.
3. On June 3 at 7:33 a.m., I contacted Andrew Troop, Charles Conrad and R.J. Shannon and informed them of Mr. Choudhri’s condition and told them I would be seeking a continuance. I did not receive a response other than Mr. Shannon asked what I would be seeking to continue.

4. Based on prior pleadings in this case, I know that NBK's lawyers have the following conflicts:

Charles Conrad: June 19-July 1

Andrew Troop June 28-July 5

5. There are several dates on which hearings are scheduled in this case, including July 8, 2024 (which may be too crowded) and July 24, 2024.
6. This motion is supported by the Declaration of Stephen W Sather.

Respectfully Submitted,

BARRON & NEWBURGER, P.C.

7320 N. MoPac Expwy., Suite 400

Austin, Texas 78731

Tel: (512) 476-9103

By: /s/ Stephen W. Sather

Stephen W. Sather

State Bar No.17657520

ATTORNEYS FOR

CREDITOR, 2425 WL,LLC

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Motion was served on the 4th day of June, 2024 to the parties on the attached list.

/s/ Stephen W. Sather

Stephen W. Sather

DECLARATION OF STEPHEN W. SATHER

1. My name is Stephen W. Sather. I am over the age of 18 years and am fully competent to give this Declaration. I have personal knowledge of the facts stated herein and they are true and correct. I give this Declaration under penalty of perjury pursuant to 28 U.S.C. Sec. 1746.
2. At approximately 6:00 a.m. on June 3, 2024, I learned that Ali Choudhri had been admitted to the hospital with a stroke on Sunday June 2, 2024. Mr. Choudhri's assistance and presence at hearings is necessary for my preparation for the confirmation hearings.
3. I informed Mr. Troop, Mr. Conrad and Mr. Shannon that I would be requesting a continuance at 7:33 a.m and included a medical record relating to Mr. Choudhri. I have not included that document in the record to protect Mr. Choudhri's privacy.. I was apparently not clear that I was seeking a continuance of the confirmation hearings because Mr. Shannon responded back and asked what I wanted continued. I informed him that it was the confirmation hearings. I know from prior pleadings that Mr. Conrad is not available from June 19-July 1 and that Mr. Troop is not available from June 28-July 5.
4. I spoke with Mr. Conrad on June 3, 2024 regarding Mr. Choudhri's condition and have exchanged multiple emails with Mr. Shannon.
5. None of the attorneys responded with dates that they would be available for a continued hearing.

Dated: June 4, 2024.

I declare the above and foregoing to be true and correct under penalty of perjury.

/s/Stephen W. Sather
Stephen W. Sather

Label Matrix for local noticing 0541-4 Case 23-34815 Southern District of Texas Houston Thu May 30 08:45:52 CDT 2024	2425 WL, LLC 2425 West Loop South 11th floor Houston, TX 77027-4304	CC2 TX, LLC c/o Howard Marc Spector Spector & Cox, PLLC 12770 Coit Road Suite 850 Dallas, TX 75251-1364
City of Houston Linebarger Goggan Blair & Sampson LLP c/o Tara L. Grundemeier PO Box 3064 Houston, TX 77253-3064	Galleria 2425 Owner, LLC 1001 West Loop South 700 Houston, TX 77027-9084	(p)HARRIS COUNTY ATTORNEY'S OFFICE P O BOX 2928 HOUSTON TX 77252-2928
Hayward PLLC c/o Melissa Hayward 10501 N. Central Expy., Ste. 106 Dallas, TX 75231-2203	Houston Community College System Linebarger Goggan Blair & Sampson LLP c/o Tara L. Grundemeier PO Box 3064 Houston, TX 77253-3064	Houston ISD Linebarger Goggan Blair & Sampson LLP c/o Tara L. Grundemeier PO Box 3064 Houston, TX 77253-3064
National Bank of Kuwait, S.A.K.P., New York	4 United States Bankruptcy Court PO Box 61010 Houston, TX 77208-1010	2425 WL, LLC 13498 Pond Springs Rd. Austin, TX 78729-4422
2425 West Loop, LLC 2000 Hughes Landing Blvd., Suite 815 The Woodlands, Texas 77380-4142	ADT PO Box 382109 Pittsburgh, PA 15251-8109	Ali Choudhry 1001 West Loop South 700 Houston, TX 77027-9084
Arin-Air, Inc. 5710 Brittmoore Rd. #13 Houston, TX 77041-5627	Ash Automated Control Systems, LLC PO Box 1113 Fulshear, TX 77441-2013	CC2 TX, LLC 14800 Landmark Blvd., Suite 400 Dallas, TX 75254-7598
CFI Mechanical, Inc 6109 Brittmoore Rd Houston, TX 77041-5610	CNA Insurance Co PO Box 74007619 Chicago, IL 60674-7619	Caz Creek Lending 118 Vintage Park Blvd No. W Houston, TX 77070-4095
Cirro Electric PO Box 60004 Dallas, TX 75266	City of Houston PO Box 1560 Houston, TX 77251-1560	City of Houston c/o Tara L. Grundemeier Linebarger Goggan Blair & Sampson LLP PO Box 3064 Houston, TX 77253-3064
Comcast PO Box 60533 City of Industry, CA 91716-0533	Datawatch Systems 4520 East West Highway 200 Bethesda, MD 20814-3382	Environmental Coalition Inc PO Box 1568 Stafford, TX 77497-1568
Ferguson Facilities Supplies PO Box 200184 San Antonio, TX 78220-0184	Firetron PO Box 1604 Stafford, TX 77497-1604	(p)FIRST INSURANCE FUNDING 450 SKOKIE BLVD SUITE 1000 NORTHBROOK IL 60062-7917

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c/o Malcolm D. Dishongh
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Humble, TX 77347-2347

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Dallas, TX 75373-4298

Lloyd E. Kelley
2726 Bissonnet Suite 240
Houston, TX 77005-1352

Logix Fiber Networks
PO Box 734120
Dallas, TX 75373-4120

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2921 E 17th St Bldg D Suite 6
Austin, TX 78702-1572

Mueller Water Treatment
1500 Sherwood Forest Dr.
Houston, TX 77043-3899

Naissance Galleria, LLC
c/o Law Office of Nima Taherian
701 N. Post Oak Rd. Ste 216
Houston, TX 77024-3868

National Bank of Kuwait
299 Park Ave. 17th Floor
New York, NY 10171-0023

Nationwide Security
2425 W Loop S 300
Houston, TX 77027-4205

Nichamoff Law Firm
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Houston, TX 77005-3253

Rodney L. Drinnon
2000 West Loop S, Ste. 1850,
Houston, Texas 77027-3744

TKE
3100 Interstate North Cir SE 500
Atlanta, GA 30339-2296

U.S. Trustee's Office
515 Rusk, Suite 3516
Houston, Texas 77002-2604

US Retailers LLC d/b/a Cirro Energy
Attention: Bankruptcy Department
PO Box 3606
Houston, TX 77253-3606

US Trustee
Office of the US Trustee
515 Rusk Ave
Ste 3516
Houston, TX 77002-2604

Waste Management
PO Box 660345
Dallas, TX 75266-0345

Zindler Cleaning Service Co
2450 Fondren 113
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Rodney Drinnon
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Houston, TX 77027-3744

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Harris County, ATTN: Property Tax Division	First Insurance Funding	(d)Harris County Tax Assessor
Harris County Attorney's Office	450 Skokie Blvd	PO Box 4622
P.O. Box 2928	Northbrook, IL 60062	Houston, TX 77210
Houston, TX 77252-2928 United States		

(d)Harris County, et al
 PO Box 2928
 Houston, TX 77252

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)2425 West Loop, LLC	(u)Sonder USA Inc.	(d)Arin-Air, LLC
		5710 Brittmoore Rd. #13
		Houston, TX 77041-5627

(du)Sonder USA Inc.	(u)Jack Rose	End of Label Matrix	
		Mailable recipients	58
		Bypassed recipients	5
		Total	63